

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

VIOLA LAIRD,)	
)	
Plaintiff,)	
)	Civil Action No.: 1:17-CV-1408
v.)	(CMH/IDD)
)	
FAIRFAX COUNTY VIRGINIA,)	
)	
Defendant.)	

MOTION FOR SUMMARY JUDGMENT

COMES NOW the Defendant Fairfax County Virginia, (“Fairfax” or “the County”), by counsel, and moves the court pursuant to Fed. R. Civ. P. 56(a) for summary judgment dismissal of all claims in this case for the reasons as argued in its Memorandum in support, on the grounds that plaintiff, Viola Laird, has failed to state claims for which relief may be granted for alleged “Discriminatory Constructive Demotion” or “Retaliatory Constructive Demotion,” in violation of Title I of the Americans with Disabilities Act, 42 U.S.C. §§ 12101, *et seq.*

FAIRFAX COUNTY VIRGINIA

By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of October, 2018, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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